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Attorneys for The Trial Lawyers College

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING  
CASPER DIVISION

THE TRIAL LAWYERS COLLEGE,  
a nonprofit corporation

Plaintiff,

v.

GERRY SPENCES TRIAL  
LAWYERS COLLEGE AT  
THUNDERHEAD RANCH, a  
nonprofit corporation, and GERALD  
L. SPENCE, JOHN ZELBST, REX  
PARRIS, JOSEPH H. LOW, KENT  
SPENCE, and JOHN DOE,  
individuals.

Defendants.

CIVIL ACTION NO. 1:20-cv-0080

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**JUDGE CARSON**

**MAGISTRATE JUDGE CARMAN**

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

PLAINTIFF The Trial Lawyers College, (“Plaintiff” or the “TLC”), respectfully requests that the Court enter a preliminary injunction against DEFENDANTS Gerry Spences Trial Lawyers College at Thunderhead Ranch, Gerald L. Spence, John Zelbst, Rex Parris, Joseph H. Low, Kent Spence, and John Doe (collectively, “Defendants”). For the reasons set forth in Plaintiff’s Memorandum in Support, TLC respectfully requests that the Court grant its Motion for Preliminary Injunction on Counts 1 and 2 of the Verified Complaint, and restrain and enjoin Defendants from directly or indirectly: (i) infringing on either of the TLC Marks, including but not limited to, using TLC’s Marks in their communications and publications and/or operating under the directly-infringing name “Gerry Spences Trial Lawyers College at the Thunderhead Ranch” or close iterations thereof; and (ii) engaging in any false designations of origin, passing off, false and misleading statements, false advertising, and/or unfair competition related to the TLC Marks and TLC’s services, including but not limited to taking any actions which suggest that “Gerry Spences Trial Lawyers College at the Thunderhead Ranch” is affiliated with TLC and/or that the Defendants represent TLC in any capacity, and/or from taking any actions that mislead or confuse the public regarding the same.

Dated: May 27, 2020

Respectfully submitted,

**THE TRIAL LAWYERS COLLEGE**

/s/ Christopher K. Ralston

Christopher K. Ralston, (La. Bar #26706)

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By: /s/ Patrick J. Murphy

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**ATTORNEYS FOR PLAINTIFF THE TRIAL  
LAWYERS COLLEGE**

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copy of the foregoing document has been served electronically by transmission to an electronic filing service provider for service through the Court's CM/ECF system to all parties this 27th day of May, 2020.

/s/ Christopher K. Ralston

Christopher K. Ralston